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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA COMMERCIAL MORTGAGE
COMPANY,

USA CAPITAL REALTY ADVISORS,
LLC,

USA CAPITAL DIVERSIFIED TRUST
DEED FUND, LLC,

USA CAPITAL FIRST TRUST DEED
FUND, LLC,

USA SECURITIES, LLC,

Debtors.

Affects:

- ☐ All Debtors
- ☒ USA Commercial Mortgage Company
- ☐ USA Capital Realty Advisors, LLC
- ☐ USA Capital Diversified Trust Deed Fund, LLC
- ☐ USA Capital First Trust Deed Fund, LLC
- ☐ USA Securities, LLC

Case No. BK-S-06-10725-LBR
Case No. BK-S-06-10726-LBR
Case No. BK-S-06-10727-LBR
Case No. BK-S-06-10728-LBR
Case No. BK-S-06-10729-LBR

CHAPTER 11

Jointly Administered Under Case No.
BK-S-06-10725 LBR

**STIPULATION TO CONTINUE
HEARING ON OBJECTION TO
CLAIM 1279 OF LERIN HILLS**

Date of Hearing: June 15, 2007
Time of Hearing: 9:30 a.m.

New Date of Hearing: October 15, 2007
Time of Hearing: 9:30 a.m.

USACM Liquidating Trust (the "USACM Trust"), by and through its counsel,
Lewis and Roca LLP, and Lerin Hills Ltd. by and through its counsel, Kehoe &
Associates, hereby stipulate:

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1 1. The USACM Trust filed an objection to Claim No. 1279 of Lerin Hills Ltd.
2 (the "Lerin Hills Objection") [DE 3080] filed in the amount of \$1,257,233.40 as an
3 unsecured non-priority claim and a priority claim of \$797,175.62.

4 2. The USACM Trust filed a Second Omnibus Objection to Claims Asserting
5 Priority Status (the "Second Objection") [DE 3259] which included an objection to Claim
6 No. 1279 filed by Lerin Hills.

7 3. Both objections [DE 3080 and DE 3259] to Lerin Hills Claim No. 1279 are
8 scheduled for hearing before this Court on October 15, 2007 at 9:30 a.m.

9 4. Lerin Hills is involved in ongoing negotiations with Compass Partners the
10 outcome of which will directly impact the amount of its claim against USACM.

11 5. The parties agree that at this time Lerin Hills is not in a position to pursue its
12 claim against USACM. In order to allow more time for the Lerin Hills' negotiations with
13 Compass Partners to progress, the parties agree that the hearing scheduled for October 15,
14 2007 on both objections [DE 3080 and DE 3259] filed by the USACM Trust to Claim No.
15 1279 be vacated and rescheduled to **December 14, 2007 at 9:30 a.m.**

16 6. The parties submit a stipulated order for the Court's convenience.

17 DATED: October 10, 2007.

18
19 **LEWIS AND ROCA LLP**

20
21 By: /s/ RC (#6593)

22 Susan M. Freeman, AZ 4199 (*pro hac vice*)

23 Rob Charles, NV 6593

24 Counsel for USACM Liquidating Trust

25 -and-

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KEHOE & ASSOCIATES

By: 3/Kehoe
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